

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

CHARLES L. HILL, JR.,

Plaintiff,

vs.

SECURITIES AND EXCHANGE  
COMMISSION,

Defendant.

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CIVIL ACTION FILE

NO. 1:15-cv-1801-LMM

**PLAINTIFF’S PROPOSED SCHEDULING ORDER**

In its June 8, 2015 Order, the Court directed the parties to “confer on a timetable for conducting discovery and briefing the remaining issues.” June 8, 2015 Order (Dkt. 28) at 45. The Court further directed the parties “to submit by June 15, 2015, a consent scheduling order to the Court for consideration.” *Id.* If the parties are unable to agree to the terms of a scheduling order, the Court provided that “the parties can submit their alternative submissions.” *Id.* Plaintiff’s counsel has conferred with Defendant’s counsel on multiple occasions and the parties are not able to agree on a proposed timetable for discovery and briefing. Thus, Plaintiff Charles L. Hill, Jr. hereby provides the following submission for a proposed scheduling order:

- **Beginning of Discovery Period:** Immediately.
- **Close of Discovery Period:** 90 days after Defendant files an answer, or, if Defendant files a Motion to Dismiss, 90 days after the Court denies the Motion to Dismiss.
- **Deadline to File Motions for Summary Judgment:** 30 days after the close of discovery.

Respectfully submitted, June 15, 2015.

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s/ Stephen E. Hudson

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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2015, I electronically filed the foregoing (PROPOSED) SCHEDULING ORDER with the Clerk of Court using the CM/ECF system, which will automatically send email documentation of such filing to the following attorneys of record:

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